

Re: Fw: Revised Protective Order

From: Ressie Thomas (ressie@poplarblufflaw.net)

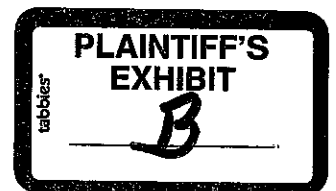
To: laurencedmass@att.net

Date: Thursday, November 3, 2022 at 04:40 PM CDT

Do you have a signed protective order for documents in this case? I've got everything ready go except it's not bates stamped. The only thing I'm not planning to turn over are some medical records that my client received a copy of through juvenile, so those are protected through that. I assume your client would have no trouble getting those records straight from the provider, but I will name them.

On Mon, Oct 3, 2022 at 4:18 PM Larry Mass <laurencedmass@att.net> wrote:

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----- Forwarded Message -----

From: Evita Tolu <evitatolu@outlook.com>

To: Susan Dimond <sdimond@robertsperryman.com>; Larry Mass <laurencedmass@att.net>; Rick Wuestling <rwuestling@robertsperryman.com>; Dustin Goldberger <dgoldberger@robertsperryman.com>; tcollins@blantonlaw.com <tcollins@blantonlaw.com>; mstanfield@blantonlaw.com <mstanfield@blantonlaw.com>; jsteffens@limbaughlaw.com <jsteffens@limbaughlaw.com>; duffe@hdp-law.com <duffe@hdp-law.com>

Cc: laurencedmass@att.net <laurencedmass@att.net>

Sent: Saturday, October 1, 2022 at 02:19:14 PM CDT

Subject: Revised Protective Order

Counsel,

Attached please find our revisions to the proposed Protective Order previously circulated by Ms. Diamond. There are several revisions made as follows:

1. A comma is added to paragraph 1 on page 2;

2. A sentence is added to paragraph 2 on page 3;
3. Several sections are added to paragraph 18. These sections are borrowed from the Missouri Rules of Professional Conduct, Rule 4-3.6 and Comments to the rule. The previous paragraph 18 selectively referred to the ethical obligations of the involved attorneys. The new expanded paragraph 18 is now fair and balanced as it contains all ethical obligations of the involved attorneys whose opinions public and/or media might seek about this case.

All changes and additions are highlighted in yellow. Please review and advise if we can file the Proposed Order with the Court. I appreciate your patience in getting our comments to you.

Best regards,

Evita Tolu

Attorney at Law

314-323-6022 telephone

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License in California, Illinois & Missouri, nation-wide immigration practice

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--

Ressie Thomas

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